

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Barcode Apparel, Inc. Plaintiff,

- against -

Pear Connection Inc.,  
Kenpo Inc., and John  
Does 1-5 Defendant.

1:07 cv 06111 (PKC)

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the  
Southern and Eastern Districts of New York, I, Charles W. Pieterse a member in good standing of  
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Abraham Mathew, Esq.  
Firm Name: Mathew & George  
Address: 801 S. Grand Avenue, Suite 1610  
City/State/Zip: Los Angeles, CA 90017  
Phone Number: (310) 478-4349  
Fax Number: (310) 478-9580

Abraham Mathew, Esq. is a member in good standing of the Bar of the States of  
California

There are no pending disciplinary proceeding against Abraham Mathew, Esq.  
in any State or Federal court.

Dated: 9/13/2007  
City, State: Greenwich, CT

Respectfully submitted,

Sponsor's Charles W. Pieterse  
SDNY Bar CP4127  
Firm Name: Whitman Breed Abbott & Morgan LLC  
Address: 500 West Putnam Avenue; Suite 2  
City/State/Zip: Greenwich, CT 06830  
Phone Number: (203) 869-3800  
Fax Number: (203) 869-1951

**UNITED STATES DISTRICT  
SOUTHERN DISTRICT OF NEW YORK**

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BARCODE APPAREL, INC.

1:07-CV-06111(PKC)

Plaintiff,

- against -

**AFFIDAVIT OF CHARLES W. PIETERSE, ESQ.  
IN SUPPORT OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

PEAR CONNECTION INC.,  
KENPO, INC., and JOHN DOES 1 – 5

Defendants.

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State of Connecticut    )  
                                      )       ss:     Greenwich  
County of Fairfield    )

Charles W. Pieterse, being duly sworn, hereby deposes and says as follows:

1. I am a member of the law firm of Whitman Breed Abbott & Morgan LLC, counsel for Defendants Pear Connection, Inc., and Kenpo, Inc. (collectively the “Defendants”) in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants’ motion to admit Abraham Mathew, Esq. as counsel pro hac vice to represent Defendants in this matter.
2. I am a member in good standing of the bars of the States of New York and Connecticut. I was admitted to practice law in the state of New York in 1988 and in the state of Connecticut in 1986. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Mr. Mathew since October, 2006.
4. Mr. Mathew is a partner with the Law Firm of Mathew & George.
5. Mr. Mathew is a member in good standing of the bar of the State of California. A certificate of good standing is attached hereto as Exhibit A.

6. My office has spoken to plaintiff's counsel and they have no objection to Mr. Mathew's admission pro hac vice in this matter.

7. I have found Mr. Mathew to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

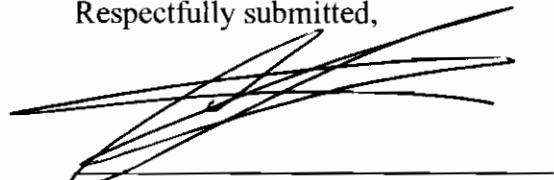
8. Accordingly, I am pleased to move the admission of Abraham Mathew, pro hac vice.

9. I respectfully submit a proposed order granting the admission of Abraham Mathew, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Abraham Mathew, pro hac vice, to represent Defendants in the above captioned matter, be granted.

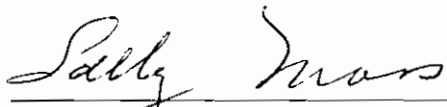
Dated: September 19, 2007  
Greenwich, CT

Respectfully submitted,

A handwritten signature in black ink, consisting of several overlapping, fluid strokes that form a cursive representation of the name Charles W. Pieterse.

Charles W. Pieterse, Esq. (CP4127)

Subscribed and sworn to before me  
This 19 day of September, 2007.

A handwritten signature in black ink, written in a cursive style, appearing to read 'Sally Moss'.

Notary Public

Sally Moss  
Notary Public Connecticut  
My Commission Expires: November 30, 2010



## THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

October 10, 2007

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, ABRAHAM PAMPAKOTTU MATHEW, #181110 was admitted to the practice of law in this state by the Supreme Court of California on December 13, 1995; that from the date of admission to March 7, 1996, he was an ACTIVE member of the State Bar of California; that on March 7, 1996, he transferred at his request to the INACTIVE status as of January 1, 1996; that from that date to September 9, 1996, he was an INACTIVE member of the State Bar of California; that on September 9, 1996, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert  
Custodian of Membership Records

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Barcode Apparel, Inc. Plaintiff,

1:07 cv 06111 (PKC)

- against -

Pear Connection Inc., Kenpo Inc., Defendant.  
and John Does 1-5

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Charles W. Pieterse attorney for Pear Connection Inc. and Kenpo Inc.  
and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Abraham Mathew, Esq.  
Firm Name: Mathew & George  
Address: 801 S. Grand Avenue, Suite 1610  
City/State/Zip: Los Angeles, CA 90017  
Telephone/Fax: (310) 478-4349  
Email Address: 310-478-9580

is admitted to practice pro hac vice as counsel for Pear Connection Inc. and Kenpo Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

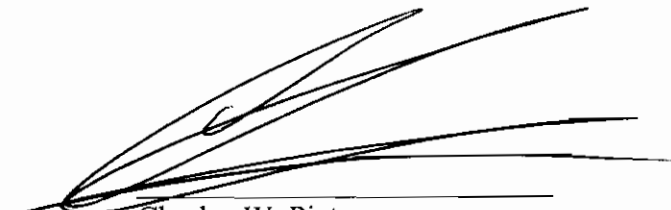
Dated:  
City, State:

\_\_\_\_\_  
United States District/Magistrate Judge

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing Motion to Admit Counsel Pro Hac Vice, Affidavit of Charles W. Pieterse, and Proposed Order, was sent via email and overnight mail, this 19<sup>th</sup> of September, 2007 to:

Vano Haroutunian, Esq.  
Ballon Stoll Bader & Nadler, P.C.  
1450 Broadway – 14th Floor  
New York, NY 10018



Charles W. Pieterse